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Attorney for Plaintiff
Carlos Chavez, Jr.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CARLOS CHAVEZ, JR.,

Plaintiff,

V.

COMMISSIONER OF
SOCIAL SECURITY,

Defendant,

Case No. 2:22-CV-00490-DMC

**STIPULATION AND ORDER, ON
PLAINTIFF'S SECOND REQUEST FOR
EXTENSION OF TIME TO FILE A
REPLY TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

The parties stipulate through counsel that Plaintiff shall have a second extension of 15 days to file a reply in support of Plaintiff's Motion for Summary Judgment and in opposition to Defendant's Motion for Summary Judgment ("Motion") (ECF No. 15), extending the date on which Plaintiff's response is due from February 2, 2023, until February 17, 2023.

Plaintiff needs more time to respond to Defendant's Motion because the undersigned attorney for Plaintiff has suffered a loss in her family on January 19, 2023, the day after the first request was submitted, Plaintiff's attorney lost her father and has been away from her office since. Due to this event, this interfered and impeded the attorney's availability to complete work during her time away.

The attorney for Plaintiff sincerely apologizes for any inconvenience to the Court, Defendant and opposing counsel. This request is made in good faith and is not intended to delay the proceedings in this matter. It is with utmost respect that consideration be given, as the

1 unexpected loss of her father, Petitioner's attorney would have been available to complete the
2 reply as previously requested
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6 Respectfully submitted,

7 DATE: February 3, 2023

/s/ Jody Marie Peterson
8 JODY MARIE PETERSON
Attorney for Plaintiff
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10 PHILLIP A. TALBERT
United States Attorney
11 MATHEW W. PILE
Associate General Counsel
12 Social Security Administration

13 DATE: February 3, 2023

By /s/ Elizabeth Landgraf
14 ELIZABETH LANDGRAF
Special Assistant United States Attorney
15 Attorneys for Defendant
16 (as approved via email)

17 **ORDER**

18 Pursuant to the parties' stipulation, IT IS SO ORDERED that Plaintiff shall
19 have an extension, up to and including February 17, 2023, to respond to Defendant's Motion for
20 Summary Judgment.
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23 Dated: February 6, 2023



24
25 DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE
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